

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Periodic Reporting of Service Performance

Docket No. RM2022-7

**COMMENTS OF THE
NATIONAL POSTAL POLICY COUNCIL
ON NOTICE OF PROPOSED RULEMAKING
(October 31, 2022)**

The National Postal Policy Council (“NPPC”) respectfully submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”) in this proceeding.¹

The Commission proposes to improve the substance of the reports on service performance that the Postal Service is required to submit on both an annual and on quarterly bases. In addition, the Commission proposes requirements that would apply to the service performance “dashboard” required by the recently enacted Postal Service Reform Act, and that the dashboard information be updated weekly.

NPPC supports improved service performance reporting that generates actionable information or benefit to business mailers and/or the mailing public. Consistent with that, NPPC previously submitted comments on the Advance

¹ Order No. 6275, Docket No. RM2022-7 (Sept. 21, 2022), 87 *Fed. Reg.* 59363 (Sept. 30, 2022) (Notice of Proposed Rulemaking to Revise Periodic Reporting of Service Performance).

Notice of Proposed Rulemaking in this docket.² In those comments, NPPC supported certain new periodic service reporting requirements and made recommendations for the service “dashboard” required by the Postal Service Reform Act of 2022. NPPC commends the Commission for incorporating many of its suggestions, and those of other mailers, in the NPRM.

NPPC in particular supports the proposals to require the Postal Service:

1. To report average actual calendar days for delivery per Market-Dominant product at District, Area, and National levels;
2. To report regularly on mail (a) excluded from measurement and (b) mail volumes measured and not measured by the Full-Service Intelligent Mail barcode;
3. To include on its “dashboard” several categories of information that can in fact be useful and actionable for mailers; and
4. To break out Reply Mail separately, to improve the visibility of the service provided to that important product.

The proposed rules would require usefully detailed information about Market-Dominant service performance, per product, including average days to delivery and the dispersion around that average. These proposals apply to both annual reports, governed by rule 3055.2, and the periodic reports governed by rule 3055.30 *et seq.* Reporting on actual days for delivery, coupled with the dispersal, would provide more useful information to mailers than reports, as currently required, that focus only on the percentages of mail that meet standards

NPPC also strongly supports proposed rule 3055.2(n), which will require more information about mailpieces excluded from service measurement, along

² *Comments of the National Postal Policy Council*, Docket No. RM2022-7 (June 3, 2022), in response to Order No. 6160, Docket No. RM2022-7 (Apr. 26, 2022) (Advance Notice of Proposed Rulemaking to Revise Periodic Reporting of Service Performance),

with the corresponding proposed “dashboard” requirements. Service performance measurements, to be credible and useful, should provide as complete a report on the mail system as possible, and NPPC encourages the Postal Service to work diligently to reduce the categories of mail that are excluded from the measurement system.

The proposed requirements for the “dashboard” required by the PSRA -- set forth in proposed rules 3055.101 through 3055.103 -- are broad and granular as Congress intended. NPPC strongly supports those proposed rules. Adoption of the Commission’s proposals should materially improve mailers’ access to useful and actionable information. NPPC particularly endorses the requirement that Reply Mail be reported separately. Proposed rule 3055.102(h).

Accordingly, the National Postal Policy Council respectfully urges the Commission to adopt its proposed regulations as discussed in these comments.

Respectfully submitted,

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